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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

GILLES COHEN, *et al.*,

Plaintiffs,

v.

SUBARU CORPORATION, *et al.*,

Defendants.

Civil Action No. 1:20-cv-08442-JHR-AMD

**NOTICE OF DEFENDANT DENSO  
INTERNATIONAL AMERICA, INC.'S  
MOTION TO DISMISS PLAINTIFFS'  
CONSOLIDATED AMENDED CLASS  
ACTION COMPLAINT**

TO: All Counsel of Record (via ECF)

**PLEASE TAKE NOTICE** that, on June 21, 2021, Defendant Denso International America, Inc. (“Defendant”) will move before this Court at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 5D, Camden, NJ 08101, before United States District Court Judge Joseph H. Rodriguez, for the entry of an Order dismissing this action against Defendant pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that in support of its Motion, Defendant shall rely upon the accompany memorandum of law, the Appendix of Supporting law annexed thereto, and Declaration of Jose L. Linares.

**PLEASE TAKE FURTHER NOTICE** that Defendant submits herewith a Proposed Form of Order granting Defendant's Motion.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the Stipulation and Order Setting Schedule for Amendment of Complaint and Response Thereto (ECF No. 30), Plaintiffs' Opposition to this Motion shall be filed on or before May 6, 2021, and Defendant's Reply to Plaintiffs' Opposition shall be filed on or before June 7, 2021.

Dated: March 22, 2021

/s/ Jose L. Linares  
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